

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JON FREY, ANDREW PERRONG	:	
and STEWART ABRAMSON on	:	CIVIL ACTION FILE NO. 1:19-CV-
behalf of themselves and others	:	02450-TWT
similarly situated,	:	
	:	
Plaintiffs,	:	
	:	COMPLAINT – CLASS ACTION
v.	:	
	:	
GREAT AMERICAN POWER, LLC	:	
and NEW WAVER POWER, LLC	:	
	:	
Defendants.	:	

PLAINTIFFS’ UNOPPOSED MOTION TO SUBSTITUTE PARTY NAME

The plaintiffs move to substitute the party name “New Wave Power, LLC” a limited liability company for the currently named “New Waver Power, LLC”. Fed. R. Civ. P. 21 states that “Parties may be ... added by order of the Court on motion of any party or of its own motion at any stage of the action and on such terms as are just.” Here, the proper party name was identified by counsel for Great American Power, LLC in their initial disclosures on September 30, 2019.

Submitted on October 1, 19.

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Class*

CERTIFICATE OF COMPLIANCE WITH L.R. 5.1.C & 7.1.D

Pursuant to L.R. 7.1.D, I certify that this document has been prepared with
14-point, Times New Roman font, approved by the Court in L.R. 5.1.C.

/s/ Anthony Paronich
Anthony Paronich